



LATSHA DAVIS YOHE  
& MCKENNA, P.C.

ATTORNEYS AT LAW

Wills 49K  
11.9  
283480



SDMS DocID 283480

PLEASE REPLY TO: Exton  
WRITER'S E-MAIL: Kmckenna@ldylaw.com

December 19, 2005

**Via Facsimile and First Class Mail**

Ms. Martha Bosworth  
Enforcement Coordinator  
U.S. Environmental Protection Agency  
Office of Site Remediation and Restorations (HBS)  
One Congress Street, Suite 1100  
Boston, MA 02114

**Re: Stepan Company  
Wells G&H Superfund Site, Woburn MA  
Our File No. 924-05**

Dear Ms. Bosworth:

Enclosed please find Stepan Company's response to the Supplemental Request for Information pursuant to Section 104 of CERCLA. As confirmed in my letter to you dated November 16, 2005, EPA agreed to an extension until December 21, 2005 for Stepan Company to submit its response.

Thank you for your cooperation and courtesy in this matter. Please feel free to contact me or Carol Bynoe at Stepan Company if you have any questions.

Sincerely,

Kevin M. McKenna

KMM/stw

Enclosure

cc: Carol A. Bynoe, Esquire (via Electronic and First Class Mail)

350 Eagleview Boulevard, Suite 100 • Exton, PA 19341 • (610) 524-8454 • FAX (610) 524-9383

1700 Bent Creek Boulevard, Suite 140 • Mechanicsburg, PA 17050 • (717) 620-2424 • FAX (717) 620-2444

3000 Atrium Way, Suite 251 • Mt. Laurel, NJ 08054 • (856) 231-5351 • FAX (856) 231-5341

Maryland Telephone: (410) 727-2810

0059-0184

**WELLS G&H Superfund Site**  
**Response of Stepan Company to Supplemental 104(e) Questionnaire**

**Information Concerning Olin's Waste Disposal and Facility Closure Activities**

1. In your 104 (e) response you stated that Olin disposed of 193 barrels of material between 1981 and 1982 which were left at the Wilmington facility by the prior owner. Please identify all of the waste carriers, companies and/or facilities used to dispose of these barrels.

**Stepan Company's 104(e) response dated March 18, 2004 did not include a statement that "Olin disposed of 193 barrels of material between 1981 and 1982 which were left at the Wilmington facility by the prior owner."**

**Stepan Company ("Stepan") is a separate and distinct company from Olin Corporation ("Olin"); the only relationship between these two companies arises out of the 1980 sale by Stepan to Olin of the plant located at 51 Eames Street, Wilmington, MA 01887 ("Wilmington Plant"). Based on this fact and the fact that Stepan has not been provided a copy of Olin's initial 104(e) responses, Stepan has no information responsive to this question.**

2. For each company, please provide:
  - a. The dates of each pickup and delivery;
  - b. The number of containers;
  - c. The type(s) of container(s);
  - d. The size(s) of containers;
  - e. The condition of each container;
  - f. The original and any subsequently added contents (i.e. bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
    - i. The name of each material;
    - ii. The chemical composition of each material;
    - iii. The physical state of each material (e.g. solid, sludge, liquid);
    - iv. The volume of each material; and
  - g. All documentation or additional information related to these transactions.

**Stepan has no information responsive to this question. See Response to Question 1.**

3. According to facility closure plan documents provided with your 104 (e) response, Respondent hired a contractor to provide disposal of four process tanks to a scrap dealer in 1986. According to the agreement between Olin and the Contractor, "all methods of disposal and disposal sites [were] subject to Olin's approval." For each of these tanks, please identify the contractor(s), scrap dealer(s), and disposal location(s) used.

**See Response to Question 1. Additionally, Stepan has not been provided copies of the "facility closure plan documents" or the agreement between Olin and the Contractor provided with Olin's 104(e) response. Therefore, Stepan has no information responsive to this question.**

#### **Information Concerning Respondent's Association with E.C. Whitney & Son**

1. In your 104 (e) response, you provided invoices documenting transactions with E.C. Whitney that reference "empty drums," "triple-rinsed empty drums," "mixed empty drums," "triple wash empty steel drum(s)," and "regular empty steel drums." Please describe the difference between each of these types of drums, including the processes used for each drum type.

**Stepan's 104(e) response dated March 18, 2004 did not include invoices documenting transactions with E.C. Whitney, and Stepan has not been provided copies of such invoices provided with Olin's 104(e) response. Therefore, Stepan has no information responsive to this question.**

2. In your 104 (e) response you stated that, pursuant to RCRA regulations, all drums were required to be "thoroughly cleaned before being transported off-site." Please describe the procedures you employed to "thoroughly clean" all the drums you sold or otherwise sent/delivered off-site for recycling and/or disposal. Please describe how you disposed of any emptied materials and/or rinse waster from these drums.

**Stepan's 104(e) response dated March 18, 2004 did not include a statement that "pursuant to RCRA regulations, all drums were required to be 'thoroughly cleaned before being transported off-site.'" Additionally, Stepan has not been provided with Olin's 104(e) response and therefore, Stepan has no information responsive to this question.**

3. Documentation regarding shipment of drums to E.C. Whitney was included in your 104(e) response. For each transaction, please provide:
  - a. The dates of each pickup and delivery;
  - b. The type(s) of containers;

- c. The size(s) of the containers;
- d. The condition of each container;
- e. The original and any subsequently added contents (i.e. bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
  - i. the name of each material;
  - ii. the chemical composition of each material;
  - iii. the physical state of each material (e.g. solid, sludge, liquid);
  - iv. the volume of each material;
- f. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- g. A description of how Respondent disposed of any emptied materials and/or rinse water; and;
- h. Any documentation or additional information regarding these transactions.

**Stepan's 104(e) response dated March 18, 2004 did not include documentation concerning shipment of drums to E.C. Whitney. Additionally, Stepan has not been provided with Olin's 104(e) response and therefore, Stepan has no information responsive to this question.**

**Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies**

1. State whether you sent/delivered containers to any other drum reconditioning/recycling company, including but not limited to Kingston Steel Drum/Great Lakes Container Corporation (now known as Mallinckrodt, Inc.), Kingsland Drum Company, Roche Brothers Barrel & Drum Co., Roy Brothers, Inc., Ryan Barrel Company, Inc., and Woburn Barrel.

**Stepan did not contract with any of the drum reconditioning/recycling companies referenced in this question.**

2. For each company identified above please provide:
  - a. The full name of each company or individual;
  - b. The full address for each company or individual;
  - c. How frequently you sent/delivered tanks to each company;
  - d. The time period during which tanks were sent/delivered;

- e. The original and any subsequently added contents (i.e. bulk raw material storage, finished product packaging and/or waste storage), including but not limited to empty barrel residues, of each container including:
  - i. the name of each material;
  - ii. the chemical composition of each material;
  - iii. the physical state of each material (e.g. solid, sludge, liquid);
  - iv. the volume of each material;
- f. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- g. A description of how Respondent disposed of any emptied materials and/or rinse water; and;
- h. Any documentation or additional information regarding these transactions.

**Stepan has no information responsive to this question.**

### **Compliance with this Request**

Note: All questions in this section refer to the present time unless otherwise indicated.

1. Describe all sources reviewed or consulted in responding to this request and all individuals who have any knowledge of, or information about, the subject matter of any of the foregoing questions, including but not limited to:
  - a. The name of each individual;
  - b. The current job title and job description of each individual;
  - c. The job title and job description during the period being investigated of each individual;
  - d. Whether each individual is a current or past employee of Respondent;
  - e. A description of the types of information the individual possesses (i.e., specific information on company operations, wastes generated, and/or waste disposal practices);
  - f. The names of all divisions or offices of Respondent for which records were reviewed;
  - g. The nature of all documents reviewed;
  - h. The locations where those documents reviewed were kept prior to review; and
  - i. The location where those documents reviewed are currently kept.

**Stepan's efforts in responding to this information request included, but was not limited to, a review of its March 18, 2004 104(e) response and a review of relevant documents related to the Wilmington plant. Carol Bynoe, Senior Attorney of Stepan, coordinated these efforts.**

WELLS G & H

DECLARATION OF STEPAN COMPANY

I declare under penalty of perjury that I am authorized to respond on behalf of Stepan Company (Respondent) and that the foregoing is complete, true and correct.

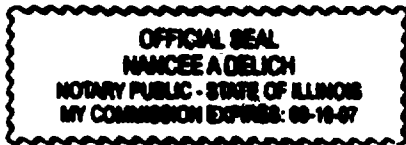
12-16-05

Date

*Carol A. Bynoe*

Carol Bynoe, Senior Attorney  
Stepan Company

*Nancee J. Delich*



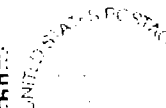


LATSHA DAVIS YOHE  
& McKENNA, P.C.

350 EAGLEVIEW BOULEVARD, SUITE 100  
EXTON, PA 19341

1105 32-2202+01120

HBS



\$00.60<sup>0</sup>

Ms. Martha Bosworth  
Enforcement Coordinator  
U.S. Environmental Protection Agency  
Office of Site Remediation and Restorations (HBS)  
One Congress Street, Suite 1100  
Boston, MA 02114

0059-0190